

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3:09-CR-210-B
	§	
JESSE WILLIAM MCGRAW (1)	§	

GOVERNMENT’S MOTION TO CONTINUE SENTENCING DEADLINE

The United States of America, by and through its United States Attorney, files this
its motion to continue the deadline for the parties to file written objection to the
Presentence Report, and for cause respectfully shows this Court as follows:

ISSUE:

1. This Court ordered that the parties file written objections to the Presentence Report
in the above entitled and numbered cause by 4:00pm on Wednesday, August 4, 2010.
However, during the week of July 26, 2010, McGraw’s attorney John Nicholson advised
the undersigned that he was filing a motion to withdraw as the attorney of record for
McGraw. Mr. Nicholson advised that the reason could be summarized as unreconcilable
differences. Mr. Nicholson also indicated that he would move to seal his motion to
withdraw.

2. On Tuesday, August 3, 2010, and again on Wednesday, August 4, 2010, Mr. Nicholson advised the undersigned that he still planned to file the motion to withdraw, and that he was not opposed to continuing the deadline to file objections to the Presentence Report.

WHEREFORE, the government requests that this Court continue the deadline for the parties to file their objections to the Presentence Report, so as to allow Mr. Nicholson time to file his motion to withdraw, and to allow the Court time to review and rule on said motion.

Respectfully submitted,

JAMES T. JACKS
United States Attorney

S/ Candina S. Heath
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CERTIFICATE OF CONFERENCE

I hereby certify that on August 3, 2010 and August 4, 2010, I spoke with Assistant Federal Public Defender (AFPD) John Nicholson, and he did not oppose a continuance of the deadline for objecting to the Presentence Report.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2010, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to John Nicholson, attorney for McGraw, who consented in writing to accept this Notice as service of a document by electronic means.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney